

## REMARKS

Applicant appreciates the Examiner's thorough examination of the present application as evidenced by the Office Action of October 19, 2005 (hereinafter "Office Action"). In response, Applicant respectfully submits that the cited reference fails to disclose at least the recitations of the independent claims. Accordingly, Applicant submits that all pending claims are in condition for allowance. Favorable reconsideration of all pending claims is respectfully requested for at least the reasons discussed hereafter.

### **Independent Claims 1, 6, 13, and 20 are Patentable**

Independent Claims 1, 6, 13, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,012,088 to Li et al. (hereinafter "Li") in view of U. S. Patent No. 6,487,594 to "Bahlmann." Claim 1, for example, is directed to a network model for managing a service and recites, in part:

an end service domain that associates the service with an end service provider, the end service domain comprising:

a plurality of wholesale service domains, respective ones of the plurality of wholesale service domains comprising at least one network that provides traffic transport for the end service domain;

**a plurality of gateways**, wherein at least a first one of the plurality of gateways couples one of the plurality of wholesale service domains to another one of the wholesale service domains and is **configured to perform protocol translation on traffic passing between the coupled wholesale service domains**, and wherein at least a second one of the plurality of gateways is configured to couple a user to the end service domain and is further configured to communicate with the user by a protocol associated with the service;

**a process domain that provides an abstract representation of applications provided by the end service domain;**

a service management system that is communicatively coupled to the end service domain, the service management system comprising:

**a plurality of software objects that represent resources in the end service domain for providing the service; and**

**a policy database that comprises rules for associating requirements of the service with resources in the end service domain.** (Emphasis added).

Claims 6, 13, and 20 include similar recitations. The Office Action alleges that Li discloses all of the recitations of independent Claim 1 except for the policy database recitation, which is alleged to be disclosed by Bahlmann. Applicant respectfully disagrees and submits that the

combination of Li and Bahlmann fail to disclose or suggest, at least, the highlighted recitations of independent Claim 1.

For example, independent Claim 1 recites "a plurality of gateways...configured to perform protocol translation on traffic passing between the coupled wholesale service domains." The Office Action alleges that point of presence (POP) element 42 of FIGS. 2 - 4 of Li corresponds to a gateway recited in independent Claim 1. (Office Action, page 3). According to Claim 1, however, at least one of the plurality of gateways is configured to perform protocol translation. As shown in FIG. 3 of Li, the POP element 42 does not include any component or module that would allow it to perform protocol translation. Thus, Applicant submits that Li fails to disclose or suggest the plurality of gateways recited in independent Claim 1.

Claim 1 further recites "a process domain that provides an abstract representation of applications provided by the end service domain." The Office Action alleges that Li discloses this recitation at col. 6, lines 13 - 16, which state:

A typical POP contains a distribution router 62 connected to a local area network 64 that distributes information among various servers and various hardware interfaces for outside communication to Internet customers.

Applicant respectfully submits that a router that routes information among servers and hardware interfaces is not "a process domain that provides an abstract representation of applications." Li does not contain any information explaining that the information routed via the distribution router 62 is an "abstract representation of applications." Thus, Applicant submits that Li fails to disclose or suggest the process domain recited in independent Claim 1.

Claim 1 further recites "a plurality of software objects that represent resources in the end service domain for providing the service." The Office Action alleges that Li discloses this recitation at col. 5, lines 30 - 38, which explains that IP network 30 may be one of many IP networks that are managed by an Internet service provider via a network operation center 40. While Applicant acknowledges that the IP network(s) contains many elements and resources to be monitored, Applicant submits that Li does not provide any disclosure or suggestion that the IP network(s) includes software objects that **represent** the resources in the IP network(s). Thus, Applicant submits that Li fails to disclose or suggest the plurality of

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software objects recited in independent Claim 1.

Claim 1 further recites "a policy database that comprises rules for associating requirements of the service with resources in the end service domain." The Office Action cites the central policy database 12 shown in FIG. 1 of Bahlmann as corresponding to the policy database recited in Claim 1. (Office Action, page 4). Applicant acknowledges that the central policy database 12 and regional policy database 14 described in Bahlmann include business rules, applications, and data used to provision network equipment. (*See, e.g.*, Bahlmann, col. 3, lines 5 - 40). Applicant submits, however, that Bahlmann does not appear to include any disclosure or suggestion of including rules that associate **requirements of a service** with the network resources. Thus, Applicant submits that Bahlmann fails to disclose or suggest the policy database recited in independent Claim 1.

Accordingly, for at least the foregoing reasons, Applicant respectfully submits that independent Claims 1, 6, 13, and 20 are patentable over Li and Bahlmann and that Claims 3 - 5, 8 - 12, 15 - 19, and 22 - 26 are patentable at least per the patentability of independent Claims 1, 6, 13, and 20.

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### CONCLUSION

In light of the above amendments and remarks, Applicant respectfully submits that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

Respectfully submitted,



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